



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ■ Nick Fish, Commissioner ■ Michael Jordan, Director

September 30, 2015

Jim Orr  
Oregon Department of Environmental Quality  
Northwest Region Cleanup Program  
700 NE Multnomah St., Suite #600  
Portland, OR 97232

**Subject:** Source Control Evaluation/Voluntary Cleanup Program Report for the Former Crown Cork and Seal Facility

Dear Jim:

The City reviewed the Source Control Evaluation/Voluntary Cleanup Program Report for the Former Crown Cork and Seal Facility, dated August 25, 2015, and prepared by URS. The report presents the findings from the Site Investigation Work Plan (February 20, 2015), which was subject to previous review and comment by the City. As requested, the site stormwater investigation included screening of the pathway from the site to the municipal combined sewer in North Lombard Street. This pathway was the focus of our review; the City offers the following comments for your consideration.

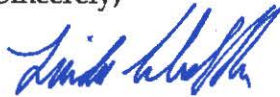
1. Site stormwater discharges to the municipal combined sewer may be in violation of City wastewater discharge limits and prohibitions. Elevated lead (possibly at hazardous waste levels) and polychlorinated biphenyls (PCBs) concentrations were found in stormwater solids collected from the onsite storm system. Proposed cleaning in the site stormwater system will remove materials that may have been deposited from legacy industrial operations at the site. However, additional data are needed to verify that ongoing sources to the site storm system are not present and that site remedial action and/or source controls are not warranted. Collection of stormwater data is warranted, following removal of contaminated material from the site storm systems discharging to the combined sewer.
2. Site data do not support statements (Sections 5.2 and 11.1.2) that there are no sources of contamination at the site. Legacy contaminants released during previous industrial operations may still be present at the site, and may still be migrating offsite via the stormwater pathway, even though there are no current operations at the site (e.g., runoff from building or asphalt surfaces where contaminants have been deposited).
3. Discharges to the municipal combined system must meet City Code. Section 10.0 acknowledges that elevated concentrations of contaminants of concern were observed in the systems discharging to the municipal combined system, but does not acknowledge that source controls may be needed to ensure that those discharges are acceptable.

Because screening of this pathway indicates that elevated levels contaminants are present, additional data are needed (see Comment 1).

4. Access to the municipal combined system in N. Lombard may be needed in order to clean the site storm systems connected to it. If so, please contact Jacob Zachry at (503) 823-7126 for more information about the process for obtaining an access permit.
5. The DEQ screening level included in Table 14 for total PCBs is incorrect. Because results are displayed in mg/kg, the screening level should be changed from 0.39 to 0.00039 to reflect the same units displayed for the results and the screening levels for individual Aroclors.

Thank you for providing the City with an opportunity to review this report. Please let me know if you need any additional information regarding these comments.

Sincerely,



Linda Scheffler  
Water Resources Program Manager

Cc: Alex Liverman, DEQ  
Eva DeMaria, EPA  
Kim Cox, City of Portland, BES